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Attorneys for Defendant: Otto Trucking LLC

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

WAYMO LLC,

Plaintiff,

v.

UBER TECHNOLOGIES, INC.;
OTTOMOTTO LLC; OTTO TRUCKING
LLC,

Defendants.

Case No. 3:17-cv-00939-WHA
**[PROPOSED] ORDER GRANTING
DEFENDANT OTTO TRUCKING'S
ADMINISTRATIVE MOTION TO FILE UNDER
SEAL PORTIONS OF ITS RESPONSE TO
PLAINTIFF WAYMO LLC'S CORRECTED
SUPPLEMENTAL BRIEF (DKT NO. 1501) IN
SUPPORT OF ITS MOTION FOR ORDER TO
SHOW CAUSE**

Courtroom: F-15th Floor
Magistrate Judge: Hon. Jacqueline Scott Corley
Trial: October 10, 2017

Filed/Lodged Concurrently with:
1. Admin. Mtn. to File Documents Under Seal
2. Declaration of Neel Chatterjee
3. Redacted/Unredacted Versions
4. Proof of Service

Defendant Otto Trucking LLC (“Otto Trucking”) has filed an Administrative Motion to File Under Seal Portions of Its Response to Plaintiff Waymo LLC’s Corrected Supplemental Brief (Dkt. 1501) in Support of its Motion for Order to Show Cause Why Defendants Should Not Be Held In Contempt (the “Administrative Motion”). Having considered the Administrative Motion, and good cause to seal having been shown, the Court **GRANTS** Otto Trucking’s Administrative Motion and **ORDERS** sealed the documents and portions of documents listed below that are adequately supported by declarations provided by Plaintiff Waymo LLC and Defendant Uber Technologies, Inc. as containing “Highly Confidential – Attorneys’ Eyes Only” or “Confidential” information pursuant to the parties’ protective order:

Document	Portions to Be Filed Under Seal
Otto Trucking’s Response to Waymo’s Corrected Supplemental Brief	Highlighted Portions
Exhibit 2 to Vu Declaration – Document Bates-stamped WAYMO-UBER-00086885 – 00086892	Highlighted Portions
Exhibit 3 to Vu Declaration – Document Bates-stamped WAYMO-UBER-00086893 – 00086906	Entire Document
Exhibit 4 to Vu Declaration – Document Bates-stamped WAYMO-UBER-00086932 – 00086939	Highlighted Portions
Exhibit 8 to Vu Declaration – Document Bates-stamped WAYMO-UBER-00011805	Entire Document
Exhibit 9 to Vu Declaration – Document Bates-stamped WAYMO-UBER-00086809 – 00086811	Entire Document
Exhibit 10 to Vu Declaration – Document Bates-stamped WAYMO-UBER-00086907 – 00086917	Entire Document
Exhibit 11 to Vu Declaration – Document Bates-stamped WAYMO-UBER-00086800 – 00086808	Entire Document
Exhibit 12 to Vu Declaration – Document Bates-stamped WAYMO-UBER-00086812	Entire Document

1	– 00086814	
2	Exhibit 13 to Vu Declaration – Document	Entire Document
3	Bates-stamped WAYMO-UBER-00084600	
4	– 00084601	
5	Exhibit 14 to Vu Declaration – Document	Entire Document
6	Bates-stamped WAYMO-UBER-00083662	
7	– 00083663	
8	Exhibit 15 to Vu Declaration – Document	Entire Document
9	Bates-stamped WAYMO-UBER-00035458	
10	– 00035459	
11	Exhibit 16 to Vu Declaration – Document	Entire Document
12	Bates-stamped WAYMO-UBER-00086817	
13	– 00086819	
14	Exhibit 17 to Vu Declaration – Document	Entire Document
15	Bates-stamped WAYMO-UBER-00084551	
16	– 00084555	
17	Exhibit 18 to Vu Declaration – Document	Entire Document
18	Bates-stamped WAYMO-UBER-00084575	
19	– 00084581	
20	Exhibit 19 to Vu Declaration – Declaration	Entire Document
21	of Michael Janosko dated March 9, 2017	
22	Exhibit 22 to Vu Declaration – Excerpts of	Highlighted Portions
23	Deposition Transcript of Kristinn	
24	Gudjonsson dated July 28, 2017	
25	Exhibit 23 to Vu Declaration – Excerpts of	Entire Document
26	Deposition Transcript of Kristinn	
27	Gudjonsson dated September 8, 2017	
28	Exhibit 25 to Vu Declaration – Excerpts of	Entire Document
	Deposition Transcript of Alexander (Sasha)	
	Zbrozek dated September 6, 2017	
	Exhibit 28 to Vu Declaration – Excerpts of	Entire Document
	Expert Report of Erik Laykin dated	
	September 7, 2017	
	Exhibit 29 to Vu Declaration – Document	Entire Document
	Bates-stamped UBER00077201 –	
	00077202	

1 Exhibit 30 to Vu Declaration -- Document
2 Bates-stamped WAYMO-UBER-00047580

Entire Document

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4 **IT IS SO ORDERED.**

5 Dated: _____, 2017

6 HON. JACQUELINE SCOTT CORLEY
7 UNITED STATES MAGISTRATE JUDGE
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CERTIFICATE OF SERVICE

I hereby certify that I electronically filed the foregoing with the Clerk of the Court for the United States District Court for the Northern District of California by using the CM/ECF system on September 15, 2017. I further certify that all participants in the case are registered CM/ECF users and that service will be accomplished by the CM/ECF system.

I certify under penalty of perjury that the foregoing is true and correct. Executed this 15th day of September 2017.

/s/ Neel Chatterjee